



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL
DIVISION OF AIR AND WASTE MANAGEMENT
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WASTE MANAGEMENT SECTION

TELEPHONE: (302) 323-4540

January 16, 1990

Mr. Robert Guarni (3HW25)
U. S. EPA Region III
841 Chestnut Building
Philadelphia, PA 19107

SUBJECT: Standard Chlorine Meeting Summary

Dear Bob:

The following is a summary of items discussed at our January 2, 1990 meeting on Standard Chlorine:

1. EPA would like additional wells to be installed to the west of the Standard Chlorine site, on Air Products' property. EPA reviewed the proposed locations of two wells to the west, prepared by Standard Chlorine, and concurred with the proposal. One well will replace well #10 originally proposed; the second well will be installed in addition to the ten (10) wells originally proposed.
2. EPA inquired about monitoring wells to be used for background groundwater data. Texaco wells to the south of Governor Lea Road can be used for background data on the Columbia aquifer; Texaco well #OR-6A can be used for background data on the Potomac aquifer.
3. EPA expressed some confusion regarding groundwater data presented as "free organics" in Standard Chlorine's Quarterly Groundwater Recovery Reports. The data represents "free product". These data will be broken down into percent benzene and its chlorinated derivatives during the RI analysis.
4. EPA would like to see a greater percentage of Standard Chlorine's RI samples analyzed for TCL/TAL scans in lieu of benzene and its chlorinated derivatives. The work plan delineates between 5-10% of all samples will be analyzed for full scans. DNREC will provide EPA data from past analyses so that the need for a greater percentage of TCL/TAL analyses can be considered further.
5. EPA found language in Standard Chlorine's Quality Assurance Project Plan (QAPjP) to be conflicting with information contained in Standard C. Hazardous Ranking Score (HRS) package. Page 1-6 in the QAPjP states groundwater is drawn from the Columbia aquifer in the vicinity of the site.

AR300506

Mr. Robert Guarni (3HW25)
January 16, 1990
Page 2

however the HRS states there are residential wells within 4000 feet of the site. At the time of the preparation of the HRS, there were wells in the vicinity of the site, but these have been replaced by city water supply due to remedial actions associated with the Delaware City PVC site. A discussion in Standard Chlorine's RI based upon a well inventory of the area should clarify these issues.

6. EPA expressed concern regarding the use of the mud rotary method for installation of monitoring wells into the Potomac aquifer. The method is acceptable as long as the mud is "thinned-out" once the clay confining layer between the Columbia and Potomac aquifers is passed through. EPA's hydrologists were invited to be present onsite to observe the drilling.

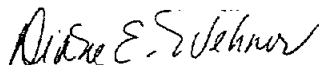
7. EPA suggested Shelby Tube samples be taken of the clay confining layer in lieu of split spoon samples. At this point in time, regional information existing on the confining layer as well as the results of the pump test to be performed on the Potomac aquifer will provide sufficient information needed to select the remedy anticipated for this site.

8. EPA will be reviewing Standard Chlorine's NPDES permit and monitoring data and would like information regarding air emissions at the site. This information is needed to allow EPA to consider the contaminant issues at the site from a multi-media approach.

EPA and DNREC also briefly discussed some problems concerning the management of this "State-Lead" project that have come to light since a new project manager took over the site at EPA two months ago. EPA apologized for having so many last-minute changes to the work plan but felt the previous project manager's review was insufficient. An attempt will be made to keep such changes to a minimum. EPA further noted that they respect the State's lead role on this site and will attempt to keep the State informed on all site related activities.

Should you have any questions on these items, please do not hesitate to contact me.

Sincerely,



Diane E. Wehner
Environmental Scientist
Superfund - Remedial

DEW:sfh
DEW2289

cc: N. V. Raman ✓

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